

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

THE UNITED STATES OF AMERICA

VS.

CRIMINAL NO. 1:15-CR-00348-SS-1

GARRY WAYNE CRAIGHEAD

MOTION TO CONTINUE SENTENCING

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the Defendant, Dr. Garry Wayne Craighead, by and through his agent and attorneys of record, Olga Seelig of Austin, Texas and Jeff Senter, of Austin and Dallas, Texas who makes and files this Motion to Continue Sentencing in the above captioned and numbered cause and would show the Court as follows:

I.

Procedural History

This Motion to Continue Sentencing represents the defendant's third (3rd) said same, previous ones filed 18 February 2016 and subsequently 16 March 2016 by then counsel of record, now terminated, James S. Bell of Dallas, Texas.

Subsequently the two (2) undersigned counsel of record have substituted in lieu of said same Mr. Bell. The consensus of which from both of whom is that a brief period is necessary to consolidate a reasonable understanding of the defendant's sentencing position and attendant

options evaluated. In fact, a preliminary health care related evaluation intended to be complemented by a subordinate health care evaluation gives rise to the necessity of the requested continuance. This Motion is not sought for the purpose of delay but in order that justice be granted.

WHEREFORE PREMISES CONSIDERED, the defendant prays the Court grant this Motion to Continue Sentencing and continue this cause until the next available date.

RESPECTFULLY SUBMITTED,

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Olga Seelig
Seelig PC
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316 W. 12th Street, Suite 109
Austin, Texas 78701
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Attorney for Defendant

/JS/
Jeff Senter, P.C.
State Bar No. 18028400
700 Lavaca Street, Ste. 1400
Austin, Texas 78701-3102
Telephone (512) 482-8112
Telefacsimile (512) 482-0076
Attorney for Defendant

CERTIFICATE OF CONFERENCE

This is to certify counsel, Jeff Senter, conferred with Assistant U.S. Attorney Mark H. Marshall yesterday 29 March 2016 at both 9:51 a.m. and 10:10 a.m., who advised neither himself nor Assistant U.S. Attorney James Blankinshop; San Antonio Division had objections to a thirty (30) day continuance.

Moreover, Counsel conferred with U.S. Probation Officer Agustin Marquez; the Pre Sentence Investigative Report author as a matter of courtesy.

____/JS/_____
Attorney

CERTIFICATE OF SERVICE

As Attorney of Record for Defendant, I do hereby Certify that a true and correct copy of the above and foregoing document was this date provided to the Attorney for the United States, and the U.S. Probation Officer, via E-Mail Message.

Date: March 31, 2016

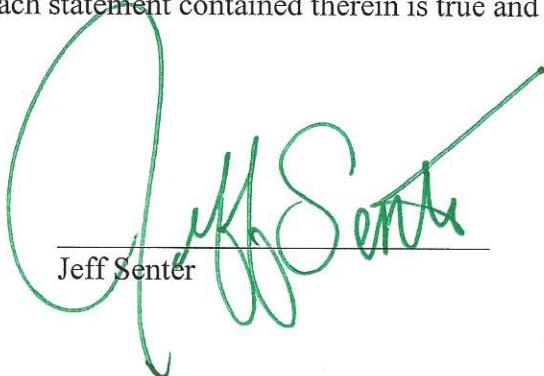
/JS/

Attorney for Defendant

VERIFICATION/AFFIDAVIT

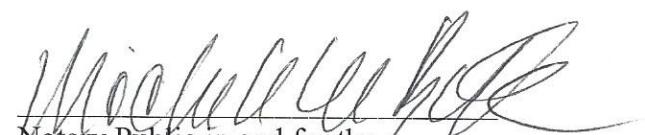
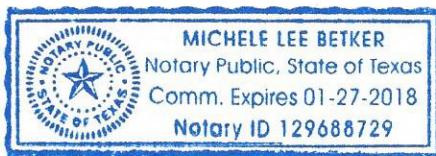
STATE OF TEXAS
COUNTY OF TRAVIS

BEFORE ME, the undersigned authority on this day personally appeared the Counsel for Defendant, Jeff Senter, known to me to be the person whose signature is subscribed below and who, being by me duly sworn on his oath, states that he is the Petitioner in the attached or foregoing Motion to Continue Sentencing, and that each statement contained therein is true and correct.



A handwritten signature in black ink, appearing to read "Jeff Senter", is written over a blue horizontal line. Below the line, the name "Jeff Senter" is printed in a smaller, black, sans-serif font.

SUBSCRIBED AND SWORN TO before me, on this 30th day of March, 2016, to certify which witness my hand and official seal of office.



A large, handwritten signature in black ink, appearing to read "Michele Lee Betker", is written over a blue horizontal line. Below the line, the name "Michele Lee Betker" is printed in a smaller, black, sans-serif font. To the right of the printed name, the text "Notary Public in and for the State of Texas" is printed in a smaller font.

CERTIFICATE OF SERVICE

As Attorney of Record for Defendant, I do hereby Certify that a true and correct copy of the above and foregoing document was this date provided to the Attorneys for the United States, and the U.S. Probation Officer, via E-Mail Message.

Date: March 31, 2016

_____/JS/_____

Attorney for Defendant